Revised 9/01

ACTION

BOGNAR, E BRAILSFORD, M.D. BURNS, T. F.

DECK. C. A. DIETERLE. S. E. FERRERA. D.W.

FERRI, M.S. GERMAIN, A. L

GIACOMINI, J.

MARTINEZ, L.A NORTH, K

PARKER, A.M

POWERS, K.

SCOTT, G.K. SMELTON, D.C. SPEARS, M.S. TRICE, K.D. TUOR, N.R.

WILLIAMS, J. L

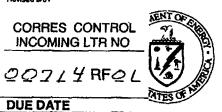
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RELLERGERIA

RODGERS, A. D SANDLIN, N. B.

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BOGENBERGER, V



Department of Energy

ROCKY FLATS FIELD OFFICE 10808 HIGHWAY 93, UNIT A GOLDEN, COLORADO 80403-8200 10CT 2 9 2004 CORRESPONDENCE

01-DOE-02003

Mr Kerrigan Clough, Assistant Regional Administrator U S Environmental Protection Agency, Region 8 999 18th Street, Suite 300 Denver, Colorado 80228

Dear Mr Clough

The Rocky Flats Environmental Technology Site (Site) requests a decision regarding the disposition of dried paints containing non-liquid Polychlorinated Biphenyls (PCB). The closure of the Site will require the demolition of numerous concrete structures, many of which are painted with PCB paint. The technical basis for this request was provided to your staff in the report titled "Risk-Based Approach for Polychlorinated Biphenyls -Based Painted Concrete," dated July 19, 2001. This report, which incorporates the risk-based approach described in 40 CFR 761 62(c), clearly shows that leaving the PCB-painted concrete on site will not pose an unreasonable risk to health or the environment.

We request that the disposition decision acknowledge that this material is mert and therefore the concrete rubble may be left on site

- 1 as backfill for the building being demolished that is the source of this material, or
- 2 may be stockpiled and be left onsite as backfill in accordance with the "Rocky Flats Cleanup (RFCA) Agreement Standard Operating Protocol (RSOP) for Recycling Concrete"

Dust control measures that will be employed during the demolition of concrete structures are described in the RFCA Standard Operating Protocol for Facility Disposition

Finally, the Department of Energy anticipates that once the PCB-painted material is integrated into the final land configuration at the Site, the Integrated Monitoring Plan (IMP) may need to be revised to include ground water monitoring for PCBs. Such revisions will be made as part of the annual review of the IMP performed by the Site at the beginning of each fiscal year of consultation with the Environmental Protection Agency and the Colorado Department of Public Health and Environment

Sincerely,

Joseph A Legare
Assistant Manager

for Environment and Stewardship

OR CONTROL X X
ADMN RECORD

Reviewed for Addressee Corres Control RFP

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lef Ltr #

OE ORDER#

CC

R DiSalvo, RFFO, DOE

D Shelton, K-H

C Deck, K-H

DOCUMENT CLASSIFICATION REVIEW WAVER FER CLASSIF'C. T'ON OFFICE ADMIN RECORD

IA-A-000996